

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRANVIA TRADING LTD.

Plaintiff,

-vs-

SUTTON CREATIONS, INC. d/b/a
SUTTON CREATIONS,

Defendant.

08 CIV. 580 (LBS) (KNF)

**PLAINTIFF'S RULE
26(a)(1) DISCLOSURES**

ECF CASE

Plaintiff GRANVIA TRADING LTD., hereby provides the following initial disclosures as required by the Federal Rules of Civil Procedure 26(a)(1):

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information;

Ganvia Trading Ltd.
Steve Suh, Vice-President
#1412, Leaders Tower, 60-15, Gasan-Dong,
Geumchun-Gu, Seoul, Korea
Tel: 822.2026.6222
Negotiated with and received orders from Sutton Creations, Inc.

Galihad Enterprise Ltd. (Agent)
Mark Weber - President
Majid Dutt - Manager
266 West 37th Street, 9th Floor
New York, New York 10018
Tel: 212.279.2200

Introduced and helped Granvia Trading Ltd. negotiate with and receive orders from Sutton Creations, Inc.

Sutton Creations, Inc.
Abe Sutton - President
Gary M. Silverstein - Senior Vice-President
1407 Broadway, 30th Floor,
New York, New York 10018
Tel: 212.391.6900

LAW OFFICE OF
JONATHAN Y. SUE

1220 Broadway
Suite 502
New York, NY 10001
212.967.1001

(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings;

See enclosed:

- Purchase Orders from Sutton Creations #915551; #915552; #915554; #915555.
- Letter of Credit issued by Israel Discount Bank of New York, on or about August 1, 2007, number L538796.

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Purchase Order from Sutton Creations:	#915551	\$52,710.00
	#915552	\$105,840.00
	#915554	\$34,920.00
	#915555	\$123,360.00
Total:		\$316,830.00 U.S. dollars

(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgement.

None

Dated: New York, New York
July 1, 2008

LAW OFFICE OF
JONATHAN Y. SUE

1220 Broadway
Suite 502
New York, NY 10001
212.967.1001

LAW OFFICE OF JONATHAN Y. SUE

/S/ Jonathan Y. Sue

By: Jonathan Y. Sue (JS / 0738)
Attorney for Plaintiff
Granvia Trading Ltd.
1220 Broadway, Suite 502
New York, New York 10001
212.967.1001

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRANVIA TRADING LTD.

Plaintiff,

-VS-

SUTTON CREATIONS, INC. d/b/a
SUTTON CREATIONS,

Defendant.

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

LAW OFFICE OF JONATHAN Y. SUE

By: Jonathan Y. Sue (JS / 0738)
Attorney for Plaintiff
1220 Broadway, Suite 502
New York, New York 10001
212.967.1001



Showroom: 1407 Broadway 30th Floor New York, NY 10018
TEL: 212-997-1234 FAX: 212-997-0606

SUTTON CREATIONS

Season
Fall 2007

Purchase Order	
PO# :	915551

DATE

REVISED

PAGE #1 OF 1

STYLE #:	DD596		
Description	JUNIOR OUTERWEAR—WOOL JACKET		
Group	Granvia Trading		
Maker	China		
Country	China		
Fiber Content	80% wool/20% Other Fibers//75D x 100D polyester satin lining		
Gauge	330 gm2	QUOTA CATEGORY	434/435
Wt/dz (g/m²)		WT/DZ (LBS.)	
TERMS	FOB	SHIP TO	New Jersey
QUANTITY	175 DOZEN	DELIVERY	October 8, 2007
TOTAL QTY	175 DOZEN	ACTUAL DEL	
PRICE	301.20 / DOZEN	SHIP VIA	Vessel
TOTAL PRICE	\$52,710.00	RN #	76050

Color (prints)	Styles	QTY pack	Doz en	Size range	Ratio
Espresso/Brown	1	12 pc pack		Small to XLarge	1-2-2-1

Label	
Devin	
Hangtag	None
PRICE TICKETS?	UPC STICKERS?
Yes	No
Lab dip Appr. by	Appr. sample by
Gallihad	Gallihad

Notes	
Packing Instructions	12 piece carton
Special Instructions	Burlington to supply price tickets—there are to be no hangtag

The Apparel Zone Signature

Designer Signature

Maker Signature



Showroom: 1407 Broadway 30th Floor New York, NY 10018
TEL: 212-997-1234 FAX: 212-997-0606

SUTTON CREATIONS

Season
Fall 2007

Purchase Order
PO# : 915552

DATE

REVISED

PAGE #1 OF 1

STYLE #:	DD595		
Description	JUNIOR OUTERWEAR—WOOL JACKET		
Group	Granvia Trading		
Maker	China		
Country	China		
Fiber Content	80% wool/20% Other Fibers//75D x 100D polyester satin lining		
Gauge	330 gm2	QUOTA CATEGORY	434/435
Wtdz (g/m²)		WT/DZ (LBS.)	
TERMS	FOB	SHIP TO	New Jersey
QUANTITY	350	DELIVERY	October 8, 2007
TOTAL QTY	350	ACTUAL DEL	
PRICE	\$302.40 / DOZEN	SHIP VIA	Vessel
TOTAL PRICE	\$105,840.00	RN #	75050

Color (prints)	Styles	QTY pack	Dozen	Size range	Ratio
Black	1	12 pc pack		Small to XLarge	1-2-2-1

Label
Devin
Hangtag None
PRICE TICKETS? Yes
UPC STICKERS? No
Lab dip Appr. by Galihad
Appr. sample by Galihad

Notes	
Packing Instructions	12 piece carton
Special Instructions	Burlington to supply price tickets—there are to be no hangtag

The Apparel Zone Signature

Designer Signature

Maker Signature

Showroom: 1407 Broadway 30th Floor New York, NY 10018

TEL: 212-997-1234 FAX: 212-997-0606

SUTTON CREATIONS

Season
Fall 2007

Purchase Order	
PO# :	915554

DATE

REVISED

PAGE #1 OF 1

STYLE #:	DD458		
Description Group	JUNIOR OUTERWEAR—WOOL JACKET		
Maker	Granvia Trading		
Country	China		
Fiber Content	80% wool/20% Other Fibers//75D x 100D polyester satin lining		
Gauge	330 gm2	QUOTA CATEGORY	434/435
Wt/dz (g/m²)		WT/DZ (LBS.)	-
TERMS	FOB	SHIP TO	New Jersey
QUANTITY	100	DELIVERY	October 8, 2007
TOTAL QTY	100	ACTUAL DEL	
PRICE	\$349.20 / DOZEN	SHIP VIA	Vessel
TOTAL PRICE	\$34,920.00	RN #	76050

Color (prints)	Styles	QTY pack	Doz en	Size range	Ratio
Black	1	12 pc pack		Small to XLarge	1-2-2-1

Label	
Devin	
Hangtag	None
PRICE TICKETS?	UPC STICKERS?
Yes	No
Lab dip Appr. by	Appr. sample by
Gallihad	Gallihad

Notes	
Packing Instructions	12 piece carton
Special Instructions	Burlington to supply price tickets—there are to be no hangtag

The Apparel Zone Signature

Designer Signature

Maker Signature

Showroom: 1407 Broadway 30th Floor New York, NY 10018

TEL: 212-997-1234 FAX: 212-997-0606

SUTTON CREATIONS

Season
Fall 2007

Purchase Order	
PO# :	915555

DATE

REVISED

PAGE #1 OF 1

STYLE #:	DD592		
Description	JUNIOR OUTERWEAR—WOOL JACKET		
Group			
Maker	Granvia Trading		
Country	China		
Fiber Content	80% wool/20% Other Fibers/75D x 100D polyester satin lining		
Gauge	330 gm2	QUOTA CATEGORY	434/435
WT/dz (g/m²)		WT/DZ (LBS.)	
TERMS	FOB	SHIP TO	New Jersey
QUANTITY	400 DOZEN	DELIVERY	October 20, 2007
TOTAL QTY	400 DOZEN	ACTUAL DEL	
PRICE	\$308.40 / DOZEN	SHIP VIA	Vessel
TOTAL PRICE	\$123,360.00	RN #	76050

Color (prints)	Styles	QTY pack	Dozen	Size range	Ratio
Espresso/Brown	1	12 pc pack		Small to XLarge	1-2-2-1

Label	
Devin	
Hangtag	None
PRICE TICKETS?	UPC STICKERS?
Yes	No
Lab dip Appr. by	Appr. sample by
Galihaad	Galihaad

Notes	
Packing Instructions	12 piece carton
Special Instructions	Burlington to supply price tickets—there are to be no hanglag

The Apparel Zone Signature

Designer Signature

Maker Signature

KOREA EXCHANGE BANK

Head Office : 181, 2-ka Uchi-ro, Chung-ku, Seoul, 100-793, Korea
(CPO BOX 2924, CABLE : KOEXBANK, TLX NO : 23141-5)

ORIGINAL

TEL : (02) 729-8525
SWIFT : KOEXKRSE

* Advice Br : 구로디지털단지지점 * Advice Date : 2007.08.02 (FAX/1072242)
=====

Advice Of * Advice No : A-0657-708-00160 (OP)
Issue of Documentary Credit * Credit No : L538796
=====

* Beneficiary : TEL. 02-2026-6227 * Applicant :
GRANVIA TRADING SUTTON CREATIONS, INC.,
RM NO1412 LEADER'S TOWER 60-15 GASAN-D 1407 BROADWAY, 30 TH FL.,
ONG GEUMCHEON-GU SEOUL NEW YORK, N.Y. 10018

* Amount : USD 316,830.00 * Issuing Bank : IDBYUS33
ISRAEL DISCOUNT BANK OF N.Y., NY
511 5TH AVENUE
NEW YORK, NY 10017
U. S. A.

* Expire Date : 2007.11.04
* Receipt No : 20070802-7-0000876-00
* Sender's Bank : IDBYUS33
=====

Gentlemen :

At the request of the Issuing bank, and without any engagement or responsibility on our part, we are pleased to inform you that we have received the following AUTHENTICATED teletransmission dated 2007.08.01.

::700 ISSUE OF A DOCUMENTARY CREDIT

:27 Sequence of Total	:1/1
:40A Form of Documentary Credit	:IRREVOCABLE TRANSFERABLE
:20 Documentary Credit Number	:L538796
:31C Date of Issue	:070801
:40E Applicable Rules	:UCP LATEST VERSION
:31D Date and Place of Expiry	✓:071104COUNTRY OF BENEFICIARY
:50 Applicant	:SUTTON CREATIONS, INC.,
	1407 BROADWAY, 30 TH FL.,
	NEW YORK, N.Y. 10018
:59 Beneficiary	:GRANVIA TRADING
	ROOM NO. 1412, LEADERS TOWER
	60-15 GASAN-DONG, GUENCHUN-GU
	SEOUL, KOREA
:32B Currency Code, Amount	:USD316830.
:39B Maximum Credit Amount	:NOT EXCEEDING
:41D Available With ... By ...	:ANY BANK
	BY NEGOTIATION
:42C Drafts At ...	:SIGHT
:42D Drawee	:OURSelves FOR 100 PERCENT OF
	INVOICE VALUE
:43P Partial Shipment	:ALLOWED
:43T Transshipment	:ALLOWED
:44E Port of Loading/Airport of Departure	:CHINA
:44F Port of Discharge/Airport of Destination	:NEW YORK
:45A Description of Goods and/or Services	
	LADIES' 75PCT WOOL 25PCT OTHERS OUTWEAR AND JACKETS. CAT. 435.
	STYLE NO. QNTY/PC USD/PC

*** This advice to be continued next page

KOREA EXCHANGE BANK

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ORIGINAL

TEL : (02) 729-8525
 SWIFT : KOEXKRSE

**** This is a constituent and integral part of advice No : A065770800160(OP)

DD596	2100	25.10
DD595	4200	25.20
DD458	1200	29.10
LATEST SHIP DATE: OCTOBER 13, 2007.		
DD592	4800	25.70
LATEST SHIP DATE: OCTOBER 20, 2007.		

+SHIPPING TERMS FOB CHINA

:46A Documents Required

+SIGNED COMMERCIAL INVOICE IN ORIGINAL AND FOUR COPIES SHOWING CLEARLY THE FOLLOWING:

A. FULL DESCRIPTION FOR EACH ITEM, KIND OF FIBER, KIND OF YARN, FOR KNIT GARMENT ONLY, THE STITCH COUNT PER ONE CENTIMETER IN BOTH HORIZONTAL AND VERTICAL DIRECTIONS.

B. THE NET NET WEIGHT (GARMENT ONLY) PER DOZEN IN ASSORTED SIZES GRAND TOTAL NET NET WEIGHT OF SHIPMENT FOR EACH STYLE.

C. THE NET WEIGHT PER DOZEN AND PER CARTON AND TOTAL NET WEIGHT OF SHIPMENT FOR EACH STYLE.

D. THE GROSS WEIGHT OF EACH CARTON, GRAND TOTAL GROSS WEIGHT OF SHIPMENT FOR EACH STYLE.

E. THE NAME AND ADDRESS OF THE MANUFACTURER.

+PACKING LIST IN ORIGINAL AND THREE COPIES SHOWING CLEARLY:

A. THE SIZE AND COLOR ASSORTMENT TO A POLYBAG ALSO TO EACH SHIPPING CARTON.

B. EXACT CARTON DIMENSIONS FOR EACH STYLE.

C. THE COMMERCIAL INVOICE NO. AND THE LETTER OF CREDIT NO.

D. STATEMENT INDICATING THIS SHIPMENT CONTAINS NO SOLID WOOD PACKING MATERIAL.

+BENEFICIARY'S STATEMENT CERTIFYING THAT ALL CARTONS ARE UNIFORM IN CONTENTS AND MATCH THE PACKING REQUIREMENTS INDICATED ON THE PURCHASE ORDER, AND THAT THERE ARE NO BROKEN SIZES OR COLORS.

+BENEFICIARY'S SIGNED AND DATED STATEMENT CERTIFYING THAT ONE COMPLETE SET OF ALL ORIGINAL DOCUMENTS INCLUDING THE CERTIFICATE OF ORIGIN, COMMERCIAL INVOICE, PACKING LIST, 1/3 ORIGINAL BILL OF LADING AND BENEFICIARY'S STATEMENT ON COMPANY LETTERHEAD HAVE BEEN SENT TO APPLICANT BY COURIER SERVICE. COPY OF COURIER SERVICE RECEIPT REQUIRED.

+PHOTOCOPY OF CERTIFICATE OF ORIGIN.

+BENEFICIARY'S STATEMENT ON COMPANY LETTERHEAD STATING THAT MERCHANDISE WAS NOT PRODUCED BY CHILD LABOR, FORCED LABOR, INDENTURED LABOR UNDER PENAL SANCTIONS, IN WHOLE OR IN PART, IN ANY STAGE OF THE PRODUCTION OR MANUFACTURE OF THE MERCHANDISE OR ANY MATERIAL OR COMPONENT THEREOF AND THAT SHIPMENT CONFORMS WITH ALL U.S. CUSTOMS SERVICE LAWS REGARDING COUNTRY OF ORIGIN.

+INSPECTION CERTIFICATE PURPORTEDLY SIGNED BY ABRAHAM SUTTON OF SUTTON CREATIONS INC.

+BALANCE 2/3 ORIGINAL CLEAN ON BOARD MARINE BILLS OF LADING TO THE ORDER OF SUTTON CREATIONS INC. MARKED NOTIFY SAME INDICATING FREIGHT COLLECT.

:47A Additional Conditions

*** This advice to be continued next page

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**** This is a constituent and integral part of advice No : A065770800160(OP)

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- +SHIPMENT EFFECTED PRIOR TO ISSUANCE OF THIS L/C NOT ACCEPTABLE.
- +VARIOUS STYLES SHIPPED ON SAME VESSEL MUST BE COVERED BY ONE SINGLE BILL OF LADING AND ONE SINGLE INVOICE. IN THE EVENT THAT MORE THAN ONE INVOICE IS PRESENTED ON EACH SHIPMENT ONE OF THE RELATIVE INVOICES MUST SHOW A DEDUCTION OF USD50.00 FOR EACH ADDITIONAL INVOICE.
- +ALL INVOICES MUST BE IN NAME OF THE APPLICANT.
- +THIRD PARTY SHIPPER AND DOCUMENTS ARE ACCEPTABLE.
- +ALL BANKING CHARGES INSIDE AND OUTSIDE USA ARE FOR THE ACCOUNT OF THE BENEFICIARY. IN THIS CONNECTION THE FIRST INVOICE PRESENTED UNDER THIS CREDIT MUST SHOW A DEDUCTION OF USD626.04 BEING OUR ISSUANCE FEE USD508.04 AND USD120.00 BEING OUR CABLE FEE. THERE WILL ALSO BE A DEDUCTION FROM THE PROCEEDS OF THE FIRST AND ANY SUBSEQUENT DRAFTS PRESENTED REPRESENTING OUR PAYMENT COMMISSION.
- +INSURANCE TO BE EFFECTED BY BUYER.
- +THIS CREDIT IS TRANSFERABLE EXCEPT TO ANY SPECIALLY DESIGNATED NATIONALS AS DEFINED IN SECTION 500.306 OF U.S. FOREIGN ASSETS CONTROL REGULATIONS. TRANSFERRING BANK MUST NOTIFY US OF ANY TRANSFERS MADE AT THE TIME OF THE TRANSFER, AND CONFIRM THAT THE TRANSFER HAS BEEN ENDORSED ON THE LETTER OF CREDIT.
- +ALL DRAFTS MUST BE MARKED DRAWN UNDER ISRAEL DISCOUNT BANK OF NEW YORK STATING THE DOCUMENTARY CREDIT NUMBER AND THE DATE OF THIS CREDIT.
- +EACH SET OF DISCREPANT DOCUMENTS WILL BE ASSESSED USD90.00 REPRESENTING OUR FEES FOR HANDLING DISCREPANCIES. THESE FEES ARE FOR THE BENEFICIARYS ACCOUNT AND WILL BE AUTOMATICALLY DEDUCTED FROM THE PROCEEDS OF THE PAYMENT WHEN EFFECTED.
- +THIS DOCUMENTARY CREDIT IS SUBJECT TO THE CURRENT UCP ICC PUBLICATION NO. 600.

:48	Period for Presentation	:DOCUMENTS TO BE PRESENTED WITHIN 15 DAYS OF ISSUANCE OF THE SHIPPING DOCUMENTS BUT WITHIN VALIDITY OF THE CREDIT.
:49	Confirmation Instructions	:WITHOUT
:78	Inst to the Pay/Accept/Negotiate Bank :	
	ALL DOCUMENTS ARE TO BE DISPATCHED TO US AT ISRAEL DISCOUNT BANK OF NEW YORK 511 FIFTH AVE NEW YORK NY 10017 IN ONE LOT	
:57D	"Advice Through" Bank	:ADVISE YOUR SEONG-SU STATION 289-10, SEONGSU-DONG, 2-GA SEONG DONG-GU, SEOUL, KOREA

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*** This advice to be continued next page

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KOREA EXCHANGE BANK

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ORIGINAL

TEL : (02) 729-8525
SWIFT : KOEXKRSE

**** This is a constituent and integral part of advice NO : A065770800160(OP)

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Please note that we reserve the right to make such corrections to this advice as may be necessary upon receipt of the cable confirmation and assume no responsibility for any errors and/or omissions in the transmission and/or translation of the teletransmission, and for any forgery and/or alteration on the credit.

If the credit is available by negotiation, each presentation must be noted on the reverse of this advice by the bank where the credit is available.

THIS ADVICE IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS (2007 REVISION, ICC PUBLICATION NO.600).

Yours very truly,

Hong Myung Sil

Authorized Signature